

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 16-10094-LTS
)	
ROSS MCLELLAN,)	
)	
Defendant.)	
_____)	

APPLICATION


Andrew E. Lelling, United States Attorney for the District of Massachusetts, hereby applies to this Court, pursuant to Title 18, United States Code, Section 6003, for an Order requiring Stephen J. Finocchi to testify or provide other information at trial in the above captioned case. In support of this application, the Government respectfully alleges as follows:

1. The government has called Stephen J. Finocchi ("Finocchi") as a witness at trial in the above captioned case.
2. It is likely that Finocchi will refuse to testify or provide other information on the basis of Finocchi's privilege against self-incrimination.
3. In the judgment of the United States Attorney, the testimony of Finocchi is necessary to the public interest.

4. This Application is made with the approval of Raymond N. Hulser, Deputy Assistant Attorney General of the Criminal Division of the Department of Justice, pursuant to the authority vested by Title 18, United States Code, Section 6003(b) and 28 Code of Federal Regulations, Section 0.175(a). A copy of the letter expressing such approval is attached hereto, and incorporated herein.

WHEREFORE, the United States Attorney requests that this Court issue an Order pursuant to Sections 6002 and 6003 of Title 18, United States Code, requiring Stephen J. Finocchi to give testimony and provide other information relating to all matters about which Finocchi may be examined at trial in the above captioned case.

Respectfully submitted,

By: 
ANDREW E. LELLING
United States Attorney

CERTIFICATE OF SERVICE

I certify that on June 11, 2018, this document was provided to defense counsel in this case via email.

/s/ Stephen E. Frank
STEPHEN E. FRANK